

WORKING SOLUTIONS

April 2, 2024

VIA ECF

Honorable Philip M. Halpern, United States District Judge
United States District Court, Southern District of New York
Hon. Charles L. Brieant Jr. Federal Building and Courthouse
300 Quarropas Street, Courtroom 520
White Plains, New York 10601

Application denied. The deadline to complete all discovery passed on February 22, 2024 (Doc. 53). The case management conference will proceed as scheduled.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
April 2, 2024

Re: *Bucciero et al., v. Amrock, LLC, Case No. 7:23-cv-4953 (S.D.N.Y.)*

Dear Judge Halpern:

Our firm represents the Named Plaintiffs and Opt-in Plaintiffs (collectively, Plaintiffs) in the above referenced matter. We write jointly with Defendant's counsel to request a 60-day extension of discovery from today and an adjournment of the case management conference, presently scheduled for April 4, 2024. To date, the parties engaged in an exchange of limited relevant documents, with a focus primarily on damages information, for the named and opt-in plaintiffs. The parties still have additional relevant documents to exchange, as well as depositions to complete. This is the parties first request of an extension of the discovery deadlines and the first request for an adjournment of the case management conference until after the close extended close fact discovery. Per Rule 1(C) of Your Honor's Individual Rules, the parties have attached a proposed amended Civil Case Discovery Plan and Scheduling Order.

We thank the Court for its time and consideration. If the Court has any questions, please do not hesitate to contact the undersigned.

Respectfully,

/s/ Rachel M. Haskell

Rachel M. Haskell, Esq.

cc: All Counsel (via ECF)